

Exhibit A

RE '755 – CLAIM 1				
	AERO-FLAP PART No.	033-08001	033-08002	033-08004
a	A mudflap for preventing spray from a wheel of a vehicle on a wet roadway from impairing the vision of drivers of other vehicles comprising a vertically extending flap which is mounted to the rear of the wheel with a front side of the flap facing the wheel and a rear side facing away from the wheel	YES	YES	YES
b	a plurality of laterally spaced, vertically extending vanes defining a plurality of vertically extending channels on the front side of the flap for directing water and debris from the wheel in a downward direction toward the ground and not to the rear or sides of the flap	SEE NOTES	YES	YES
c	and vertically extending slotted openings in the channels of a size permitting air to pass through the openings to the rear of the flap and preventing water and debris from doing so.	SEE NOTES	YES	YES
Notes: (1) Part No. 033-08001 is a modification of either Part No. 033-08002 or 033-08004. The undisputable material truth is that Plaintiff ordered a mold from Viking Tool ¹ that can only produce Part No. 033-08002 and 033-08004. Plaintiff purchases these two mud flaps from the injection molder, H S Die & Engineering Inc; ² and then modify them in house for different configurations. (2) Therefore part no. 033-08001 literally infringes Surti's '755 patent. (3) Part No. 033-08001 should also be covered under the "Doctrine of Equivalents" because even though its vanes, channels and slotted openings are not vertical, they prevent while directing water and debris from the wheel in downward direction towards the ground and not to the rear or sides of the flap. (ECF No. 193 filed 09/03/15 PageID.2047 to 2052 –Paragraph 31-42)				

¹ FLEET 000962² FLEET 000954